

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

GLENN BURTON, JR.
Plaintiff,

Case No.: 07-C-0303

vs.
AMERICAN CYANAMID CO., et. al.
Defendants;

RAVON OWENS
Plaintiff,

Case No.: 07-C-0441

vs.
AMERICAN CYANAMID CO., et. al.
Defendants;

CESAR SIFUENTES
Plaintiff,

Case No.: 10-C-0075

vs.
AMERICAN CYANAMID CO., et. al.
Defendants.

PLAINTIFF _____'S PROPOSED PHASE 2 VERDICT FORM

Question 1: Was National Lead negligent in producing or marketing white lead carbonate?

Yes _____

No _____

Please proceed to answer question 2.

Question 2: Was the white lead carbonate manufactured and sold by National Lead defective and unreasonably dangerous due to inadequate warnings at the time the product was sold?

If you answered "yes" to question 2, then answer question 3. If you answered "no" to question 2, then answer 4.

Question 3: Was National Lead's inadequate warnings a cause of _____'s injuries?

If you answered "yes" to either or both questions 1 or 3, then answer question 4.

If you answered “no” to both questions 1 and 3, then skip question 4 and answer question 5.

Question 4: The liability found in Phase 1 of this trial should be apportioned amongst the white lead carbonate companies as follows:

Sherwin-Williams _____%

Atlantic Richfield _____%

DuPont _____%

Armstrong Containers _____%

National Lead _____%

The percentages must total 100% and no individual percentage can be 0%.

If you answered question 4, skip question 5 and proceed to sign and date this verdict form.

Question 5: The liability found in Phase 1 of this trial should be apportioned amongst the white lead carbonate companies as follows:

Sherwin-Williams _____%

Atlantic Richfield _____%

DuPont _____%

Armstrong Containers _____%

The percentages must total 100% and no individual percentage can be 0%

If you skipped question 4 and answered question 5, proceed to sign and date this verdict form.

Each juror should sign and date this verdict form.

Foreperson

Date

Juror

Date

Juror

Date

Juror

Date

Juror

Date

Juror

Date

Juror

Date

Dated: May 31, 2019

Respectfully Submitted,

By:

/s/ Fidelma L. Fitzpatrick
Fidelma L. Fitzpatrick, Esq.
Robert J. McConnell, Esq.
MOTLEY RICE, LLC
55 Cedar Street, Suite 100
Providence, RI 02903
Telephone: 401-457-7700
Facsimile: 401-457-7708
ffitzpatrick@motleyrice.com
bmccConnell@motleyrice.com

Caroline W. Rion, Esq.
MOTLEY RICE, LLC
28 Bridgeside Blvd.
Mount Pleasant, SC 29464
Telephone: 843-216-9168

Facsimile: 843-216-9450
crion@motleyrice.com

Peter G. Earle, Esq.
LAW OFFICES OF PETER EARLE
839 N. Jefferson Street, Suite 300
Milwaukee, WI 53202
Telephone: (414) 276-1076
peter@earle-law.com

Victor C. Harding, Esq.
WARSHAFSKY, ROTTER, TARNOFF & BLOCH
839 N. Jefferson Street, Suite 300
Milwaukee, WI 53202
Telephone: (414) 276-4970
vich@warshafsky.com

Neil T. Leifer, Esq.
NEIL T. LEIFER, LLC
16 Kingswood Road
Auburndale, MA 02466
Admitted Pro hac Vice
Telephone: (616) 429-4892
n.leifer@ntllaw.com

Edward A. Wallace, Esq.
Lauren C. Kaplan, Esq.
WEXLER WALLACE LLP
55 West Monroe Street, Suite 3300
Chicago, IL 60603
Telephone: (312) 346-2222
eaw@wexlerwallace.com
lck@wexlerwallace.com

Attorneys for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2019, a true and correct copy of the foregoing was served
via ECF filing on all counsel of record.

/s/ Fidelma L. Fitzpatrick